UNITED STATES DISTRICT COURT FOR THE DISTRICT MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS

LIABILITY LITIGATION

MDL No. 2419

Master Dkt.: 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

**All Actions** 

## MOTION FOR ADMISSION PRO HAC VICE

COMES NOW, R. Scott Krause, Ashley L. Marucci and Eccleston and Wolf, P.C., on behalf of non-party Harford County Ambulatory Surgery Center, LLC and its employees, and moves, pursuant to Local Rule 83.5.3 and this Court's Orders, for admission *pro hac vice* in the above-referenced litigation. In support of this Motion, undersigned counsel states:

- 1. Mr. Krause has attached an Affidavit to this Motion affirming that he is a member of the bar in good standing in every jurisdiction where he is admitted to practice, there are no disciplinary proceedings pending against him and he is familiar with the Local Rules of the U.S. District Court for the District of Massachusetts. *See* Exhibit 1, Affidavit of R. Scott Krause in support of Motion for Admission *Pro Hac Vice*.
- 2. Ms. Marucci has attached an Affidavit to this Motion affirming that she is a member of the bar in good standing in every jurisdiction where she is admitted to practice, there are no disciplinary proceedings pending against her and she is familiar with the Local Rules of the U.S. District Court for the District of Massachusetts. *See* Exhibit 2, Affidavit of Ashley L. Marucci in support of Motion for Admission *Pro Hac Vice*.

3. The appropriate filing fee for admission of undersigned counsel *pro hac vice* is submitted herewith.

WHEREFORE, undersigned counsel respectfully requests that this Court grant their Motion for Admission *Pro Hac Vice* in the above-referenced MDL litigation.

Respectfully submitted,

## /s/R. Scott Krause

R. Scott Krause (Fed. Bar No. 23667) ECCLESTON & WOLF, P.C. Baltimore-Washington Law Center 7240 Parkway Drive, 4th Floor Hanover, MD 21076-1378 (410) 752-7474 (phone) (410) 752-0611 (fax) E-mail: Krause@ewmd.com

## /s/Ashley L. Marucci

Ashley L. Marucci (Fed Bar No. 18642)
ECCLESTON & WOLF, P.C.
Baltimore-Washington Law Center
7240 Parkway Drive, 4th Floor
Hanover, MD 21076-1378
(410) 752-7474
(410) 752-0611 (fax)
E-mail: marucci@ewmd.com

## **CERTIFICATE OF SERVICE**

This will certify that a true and accurate copy of the foregoing Motion for Admission *Pro Hac Vice* was served on all counsel of record by virtue of the Court's electronic filing system this 3rd day of June, 2015.

/s/ Ashley L. Marucci
Ashley L. Marucci